

AO 120 (Rev. 3/04)

TO: Mail Stop 8 Director of the U.S. Patent and Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450	REPORT ON THE FILING OR DETERMINATION OF AN ACTION REGARDING A PATENT OR TRADEMARK
---	---

In Compliance with 35 U.S.C. § 290 and/or 15 U.S.C. § 1116 you are hereby advised that a court action has been
filed in the U.S. District Court District of Nevada on the following ☒ Patents or ☐ Trademarks:

DOCKET NO. 2:08-cv-00175-PMP	DATE FILED 2/11/2008	U.S. DISTRICT COURT District of Nevada
PLAINTIFF 1st Technology LLC		DEFENDANT Betcorp Ltd.
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
1 5,564,001		
2		see attached Complaint
3		
4		
5		

In the above—entitled case, the following patent(s)/ trademark(s) have been included:

DATE INCLUDED	INCLUDED BY <input checked="" type="checkbox"/> Amendment <input checked="" type="checkbox"/> Answer <input checked="" type="checkbox"/> Cross Bill <input checked="" type="checkbox"/> Other Pleading		
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK	
1			
2			
3			
4			
5			

In the above—entitled case, the following decision has been rendered or judgement issued:

DECISION/JUDGEMENT

CLERK Lance S. Wilson	(BY) DEPUTY CLERK /s/ Robert Johnson	DATE 2/11/2008
---------------------------------	--	--------------------------

Copy 1—Upon initiation of action, mail this copy to Director Copy 3—Upon termination of action, mail this copy to Director
Copy 2—Upon filing document adding patent(s), mail this copy to Director Copy 4—Case file copy

1 L. Kristopher Rath (5749)
2 krath@hutchlegal.com
3 Hutchison & Steffen, LLC
4 Peccole Professional Park
5 10080 Alta Drive, Suite 200
6 Las Vegas, Nevada 89145
7 Telephone: (702) 385-2500
8 Facsimile: (702) 385-2086

9 Philip P. Mann (Pro Hac Vice Pending)
10 phil@mannlawgroup.com
11 Mann Law Group
12 1420 Fifth Avenue, Suite 2200
13 Seattle, Washington 98101
14 Telephone: (206) 241-5100

15 Attorneys for Plaintiff
16 1ST TECHNOLOGY LLC

17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 1ST TECHNOLOGY LLC, a Nevada
20 Limited Liability Company,

21 Plaintiff,

22 v.

23 BETCORP LTD., an Australian Company
24 Defendant.

CASE NO.

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY DEMANDED

25 **COMPLAINT FOR PATENT INFRINGEMENT**

26 Plaintiff 1st Technology LLC ("1st Technology"), alleges the following against Betcorp Ltd.
27 ("Defendant"):

28 **INTRODUCTION**

1. Dr. Scott Lewis ("Dr. Lewis") is the Controlling Manager of 1st Technology.
2. Dr. Lewis received B.S. and M.S. degrees in mechanical and electrical engineering

1 from M.I.T. with honors. Dr. Lewis has a Ph.D. from Oxford University in adaptive digital
2 processing as a Marshall Scholar and an M.B.A. from Harvard Business School. Dr. Lewis led the
3 development of single-chip video and audio compression solutions, as well as the first automotive
4 video cellular telephone.
5

6 3. Dr. Lewis invested substantial resources to invent a number of multimedia
7 communication technologies, including the separation, processing and recombination of multiple
8 streams of multimedia data. This processing can include enhancement, compression and other
9 forms of data manipulation. Dr. Lewis was issued number of patents for his inventions. The
10 inventions of Dr. Lewis's patents are used in many online wagering systems.
11

12 4. United States Patent No. 5,564,001, entitled "Method and System for Interactively
13 Transmitting Multimedia Information Over a Network Which Requires Reduced Bandwidth," was
14 issued to Dr. Lewis on October 8, 1996.
15

16 5. 1st Technology LLC ("1st Technology") is the assignee of and owns all rights, title
17 and interest in the '001 Patent and has standing to sue for infringement of the '001 Patent.
18

PARTIES

19 6. 1st Technology is a Nevada Limited Liability Company with offices at 10080 Alta
20 Drive, Las Vegas, Nevada, 89145.
21

22 7. Upon information and belief, defendant Betcorp Ltd., is a foreign company with
23 headquarters in Australia engaged in the business of providing software products useful in
24 connection with operating various internet gambling websites, including gambling websites
25 accessible to users in the United States.
26

27 8. Defendant until at least October 2006 or later, continued to infringe by making,
28

1 using, selling, offering for sale and/or importing into the United States software products that
2 infringe one or more claims of the '001 Patent. Defendant has infringed the '001 Patent either
3 directly or through acts of contributory infringement or inducement in violation of 35 U.S.C. § 271.
4

5 **JURISDICTION AND VENUE**

6 9. This Court has subject-matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338.
7 This Court also has diversity jurisdiction under 28 U.S.C. § 1332(a), as there is complete diversity
8 of citizenship and the matter in controversy exceeds the sum of \$75,000. Venue is proper in this
9 judicial district pursuant to 28 U.S.C. §§ 1391(b), (d) and 1400(b).
10

11 **DEFENDANT'S ACTS OF PATENT INFRINGEMENT**

12 10. Defendant has infringed the '001 Patent either directly or through acts of
13 contributory infringement or inducement in violation of 35 U.S.C. § 271.
14

15 11. Defendant has infringed and continued to infringe at least Claim 26 of the '001
16 Patent until at least October 2006 or later.

17 12. Upon information and belief, Betacorp.'s infringement was willful.

18 **PRAYER FOR RELIEF**

19
20 WHEREFORE, 1ST Technology LLC asks this Court to enter judgment against defendant
21 and against their receivers, subsidiaries, affiliates, agents, servants, employees and all persons in
22 active concert or participation with them, granting the following relief:

23 A. An award of damages adequate to compensate 1ST Technology LLC for the
24 infringement that has occurred, together with prejudgment interest from the date infringement of
25 the '001 patent began;

26 B. Increased damages as permitted under 35 U.S.C. § 284;

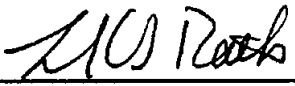
27 C. A finding that this case is exceptional and an award to 1ST Technology LLC of its
28

1 E. Such other and further relief as this Court or a jury may deem proper and just.

2
3 **JURY DEMAND**

4 1st Technology hereby demands a trial by jury of all issues.

5 DATED this 8th day of February, 2008.

6 
7 L. Kristopher Rath (4639)
8 Hutchison & Steffen, LLC
9 Peccole Professional Park
10 10080 Alta Drive, Suite 200
11 Las Vegas, Nevada 89145

12 Philip P. Mann
13 Mann Law Group
14 1420 Fifth Avenue, Suite 2200
15 Seattle, Washington 98101

16 Attorneys for Plaintiff
17 1ST TECHNOLOGY LLC
18
19
20
21
22
23
24
25
26
27
28